

Marquis Aurbach Coffing

Nick D. Crosby, Esq.
 Nevada Bar No. 8996
 10001 Park Run Drive
 Las Vegas, Nevada 89145
 Telephone: (702) 382-0711
 Facsimile: (702) 382-5816
 ncrosby@maclaw.com

*Attorneys for Defendants, LVMPD,
 Joseph Lombardo, John Pelletier, Richard Maupin,
 Ryan Fryman, Juan Contreras, Allen Pavese and
 Brandon Meads*

UNITED STATES DISTRICT COURT**DISTRICT OF NEVADA**

NEBYOU SOLOMON, an individual,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE
 DEPARTMENT; JOSEPH LOMBARDO,
 individually and in his official capacity as
 Sheriff; JOHN L. PELLETIER, an individual;
 RICHARD E. MAUPIN, an individual;
 RYAN J. FRYMAN, an individual; JUAN D.
 CONTRERAS, an individual; ALLEN J.
 PAVESE, an individual; BRANDON M.
 MEADS, an individual; FASHION SHOW
 MALL, LLC, a Nevada limited-liability
 company; UNIVERSAL PROTECTION
 SERVICE, LLC, a Nevada limited-liability
 company; ANDREW ANTONIO, an
 individual, EDUARDO AGUILAR, an
 individual, DOES I-V, individuals,

Defendants.

Case Number: 2:19-cv-00652-JAD-CWH

**REVISED STIPULATION AND ORDER
 TO EXTEND DISCOVERY
 DEADLINES (SEVENTH REQUEST)**

Pursuant to Fed. R. Civ. P. 16(b)(4) and Local Rule 26-3, Defendants, the Las Vegas Metropolitan Police Department (the “Department” or “LVMPD”), Joseph Lombardo (“Lombardo”), John Pelletier (“Pelletier”), Richard Maupin (“Maupin”), Ryan Fryman (“Fryman”), Juan Contreras (“Contreras”), Allen Pavese (“Pavese”), and Brandon Meads (“Meads”) (collectively “LVMPD Defendants”), by and through their counsel of record,

Nick D. Crosby, Esq., of the law firm of Marquis Aurbach Coffing; and Plaintiff Nebyou Solomon ("Solomon"), by and through his counsel of record, Margaret A. McLetchie, Esq., Alina M. Shell, Esq. and Leo S. Wolpert, Esq., of the McLetchie Law firm, hereby stipulates and requests the Court to extend the discovery deadlines by forty-five (45) days as follows.

I. DISCOVERY CUT-OFF DEADLINES

	Current Deadlines	Deadlines
Discovery Cut-Off	July 7, 2021	August 23, 2021
Dispositive Motions	August 5, 2021	September 20, 2021
Pre-Trial Order	September 8, 2021	October 25, 2021

II. REASON FOR REQUESTED EXTENSION

This Stipulation is made in good faith and not for purposes of delay. The parties have been diligently engaged in written discovery and coordinating depositions. Plaintiff noticed the depositions of LVMPD Rule 30(b)(6) witness(es) for June 30, Fryman on July 1 and Maupin on July 2. Counsel for Defendants is out of the jurisdiction on the dates identified for the aforementioned depositions and, as such, the parties are working together to identify new deposition dates for these witnesses, as well as the Plaintiff's deposition, and are confident all depositions will be completed within the time frame sought in the instant Stipulation.

A. DISCOVERY COMPLETED

The following discovery has been completed to date:

1. The Parties have exchanged their FRCP 26.1 Production of Documents and Witness List;
2. Plaintiff has responded to Defendant LVMPD's written discovery requests; and
3. Defendant has responded to Plaintiff's written discovery requests.

B. DISCOVERY REMAINING

The Parties agree that the following discovery must be completed:

1. Additional written discovery;
2. The deposition of Plaintiff (currently scheduled for 8/3/21);
3. The deposition of Defendants Fryman and Maupin (currently scheduled for 7/27/21 and 7/29/21);
4. The deposition of the Fed. R. Civ. P. 30(b)(6) witness for LVMPD (currently scheduled for 7/30/21);
5. The deposition of additional witnesses; and
6. Addition records collection.

III. CONCLUSION

Based on the above, the Parties respectfully request that this Court extend the current deadlines by forty-five (45) days in order to allow the Parties adequate time to complete discovery, conduct depositions and resolve any present conflicts.

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1 **IT IS SO STIPULATED.**

2 Dated this 8th day of July, 2021.

Dated this 8th day of July, 2021.

3 **MARQUIS AURBACH COFFING**

MCLETCHIE LAW

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5 By: /s/ Nick D. Crosby, Esq.

By: /s/ Margaret A. McLetchie, Esq.

6 Nick D. Crosby, Esq.
7 Nevada Bar No. 8996
8 10001 Park Run Drive
9 Las Vegas, Nevada 89145
10 Attorneys for LVMPD Defendants

Margaret A. McLetchie, Esq.
Nevada Bar No. 10931
Alina M. Shell, Esq.
Nevada Bar No. 11711
Leo S. Wolpert, Esq.
Nevada Bar No. 12658
602 South Tenth Street
Las Vegas, Nevada 89101
Attorneys for Plaintiff

11 **ORDER**

12 IT IS SO ORDERED:

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15 DANIEL J. ALBREGTS
16 UNITED STATES MAGISTRATE JUDGE

MARQUIS AURBACH COFFING

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

From: Alina <Alina@nvlitigation.com>
Sent: Thursday, July 8, 2021 2:38 PM
To: Suzanne Boggs; Pharan; Maggie
Cc: Nick Crosby
Subject: RE: [External] Solomon v. LVMPD / Fed. Case No. Case 2:19-cv-00652-JAD-DJA

Hi Suzanne:

At page 2, line 24, it should say "Plaintiff has" instead of "Plaintiff as." With that change, you have my permission to affix my electronic signature.

Thank you!

Alina M. Shell



ATTORNEYS AT LAW
602 South Tenth Street
Las Vegas, NV 89101
(702)728-5300 (T) / (702)425-8220 (F)
www.nvlitigation.com

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From: Suzanne Boggs <sboggs@maclaw.com>
Sent: Thursday, July 8, 2021 2:29 PM
To: Alina <Alina@nvlitigation.com>; Pharan <pharan@nvlitigation.com>; Maggie <maggie@nvlitigation.com>
Cc: Nick Crosby <NCrosby@maclaw.com>
Subject: RE: Solomon v. LVMPD / Fed. Case No. Case 2:19-cv-00652-JAD-DJA
Importance: High

Dear Counsel:

Pursuant to the Court's request, please find attached the **Revised** Stipulation and Order regarding the above matter for your review. If you approve, please advise our office if we may use your e-signature before sending to the Court.

Thank you,

Suzanne Boggs